Scholar Academy Integrated Pest Management Plan

Pest Management Policy Statement

Structural and landscape pests can pose significant problems in the urban environment. The pesticides used to remediate such pests can also pose health risks to people, non-target organisms, and the environment. These same pesticides may pose special health risks to children due in large part to their still-developing organ systems. Because the health and safety of students and staff is our first priority, it is the school's policy to use Integrated Pest Management ("IPM") procedures for the control of structural and landscape pests. Through the use of IPM, the school will minimize pesticide use and maximize pest control, thereby reducing the exposure of children, parents, and staff to both.

To accomplish this goal, managers will utilize physical, mechanical, cultural, biological, and educational tactics as primary controls. Reduced-risk chemical controls will be used when necessary. Pests will be controlled to maintain the integrity of school buildings and grounds, to protect the health and safety of children and staff, and to maintain a productive learning environment. Pesticides will not be used to control pests for aesthetic reasons alone. Contractors working in school buildings and grounds are required to adhere to all provisions of this policy.

Pest Management Plan

Pests are populations of living organisms (animals, plants, or microorganisms) that interfere with use of the facility by students and staff. Strategies for managing pest populations will be influenced by the pest species and whether that species poses a threat to people, property, or the environment.

<u>IPM Coordinator</u>

1. The school shall appoint an IPM Coordinator who shall have primary responsibility for ensuring that this IPM procedure is carried out. The IPM Coordinator will oversee custodial, building and grounds, and maintenance staff to ensure implementation of pest prevention measures; manage pest control contractors and staff engaged in monitoring and control of pest problems; communicate with the principal to carry out posting and notification, recordkeeping, and education provisions in this policy; provide IPM information to the school community (including parents) and answer questions on IPM topics; conduct an annual evaluation for the progress of the IPM program.

Integrated Pest Management Procedures

IPM procedures will determine when to control pests and whether to use mechanical, physical, chemical, cultural, or biological means. IPM practitioners depend on current, comprehensive information on the pest and its environment and the best available pest control methods. Applying IPM principles prevents unacceptable levels of pest activity and damage with the least possible hazard to people, property, and the environment.

It is the school's policy to utilize IPM principles to manage pest populations adequately. The full range of alternatives, including no action, will be considered. Cost or staffing considerations alone will not provide adequate justification for use of chemical control agents. Therefore, non-chemical pest management methods will be implemented whenever possible to provide the desired control.

When a pesticide must be used in order to meet important pest management goals, the least hazardous material will be chosen. The application of pesticides is subject to applicable federal, state, and local laws.

1. Integrated Pest Management programs are designed to prevent pest problems whenever possible. This is done through monitoring, regular inspections, high standards of sanitation and pest proofing measures, or modification of environmental conditions leading to pest problems.
2. The school will establish pest tolerance thresholds for common pests. Threshold values will vary depending on the organism (e.g., the threshold may be higher for crickets than for venomous insects). Thresholds will not be set based on aesthetic criteria alone. These thresholds will serve as an indicator for pest population levels and the point at which control measures will be undertaken. Control measures will not be undertaken if pest damage or populations are below threshold levels. In such cases, pest managers will use preventive measures such as improved sanitation, clutter reduction and exclusion of pests.
3. When pests exceed tolerance thresholds, non-chemical pest control measures (e.g., sanitation, screening, physical barriers, vacuuming, mulching, irrigation, fertilization, manual weeding, insect nest removal, pest-resistant plant selection) will be employed.
4. Pesticides will be used when appropriate along with other management practices or when other pest prevention and non-chemical control measures have failed to reduce pests below tolerance thresholds. Cost or staffing considerations alone will not be adequate justification for the use of chemical control agents. When a pesticide must be used, the smallest amount of the reduced-risk product that will meet pest management goals will be used.
5. **No routinely-scheduled (e.g., seasonal, monthly or weekly) pesticide applications will be made. No pesticide fogging or space spraying will be conducted inside or outside.** Insecticides will be used only in containerized baits or for spot treatments targeted to insect infestations or problem areas where a minimal amount of material is used. Rodent baits shall not be used unless in childproof bait boxes. Bait boxes shall be inaccessible to children and tethered when appropriate.
6. To ensure the safety of students and staff, the following criteria will be used to ensure that the least hazardous pesticide and/or the least hazardous method of control be utilized:
    a. No use of any pesticide classified as highly acutely toxic by the U.S. EPA. This includes Hazard Category I and II, signal words DANGER and WARNING.
    b. The school shall not use any pesticide unless all ingredients in the product have been evaluated by the U.S. EPA and found to include no possible, probable, known, or likely human carcinogens; no reproductive toxicants; no known, probable or suspected endocrine disruptors; and no nervous system toxicants (either cholinesterase inhibitors or listed as neurotoxins by the Toxics Release

Inventory.) A pesticide will not be used if the facility does not have information on its ingredients, including inert ingredients.

c. All ingredients in pesticides used by the school shall have a soil half-life of 30 days or less.
d. Properly applied gel bait or tamper-resistant containerized bait can be exempted from these requirements if it represents the least hazardous treatment option.

7. The administration must approve pesticide applications in advance; antimicrobial agents and insecticide and rodenticide baits, because they pose less risk to human health, are exempt from approval. Pesticides will be applied by certified pesticide applicators only when no one is present in the building or the grounds of the school to be treated. The application of such pesticides is subject to applicable federal, state, and local laws.

Education

Staff, students, pest managers, and the public will be educated about potential school pest problems and the IPM policies and procedures to be used to achieve the desired pest management objectives.

1. This IPM plan will be available to parents on the school's website;
2. Staff will receive information and/or training on their role in pest management.

Record Keeping

Records of pesticide use shall be maintained. Records must be current and accurate. These records shall be made available upon request to school staff and the general public during normal operating hours, and shall be kept for at least three years.

The following records will be maintained:

1. Current list of pesticides used, pesticide Material Safety Data Sheets (MSDSs), pesticide product labels, and available manufacturer information about inert ingredients;
2. Records of all pest control actions (location, purpose, and complete information on the pesticide as indicated above);
3. Information on the number of pests or other indicators of pest activity that can verify the need for action.

Notification

This school will notify the school staff, students, and parents of upcoming pesticide treatments as provided below. Antimicrobial agents, such as sanitizers and insecticide and rodenticide baits, are exempt from notification requirements. Notification will occur in accordance with local/state laws. Exemptions from prior notification shall include emergency situations and applications of bait pesticides and/or container-delivery systems.

1. All parents and staff will be notified of a pesticide application at least three (3) business days prior to any pesticide applications in buildings or on grounds, with the

exception of exempt applications. Parents should be notified each time a non-exempt pesticide is applied. Neighbors immediately adjacent to the school property will be notified at least two business days in advance of outdoor pesticide applications.

2. Applications exempt from prior notification are: antimicrobial agents, insecticide and rodenticide baits; container-delivery systems; emergency situations.
3. In situations where pesticides must be applied on an emergency basis and are not an antimicrobial agent, insecticide or rodenticide bait, or a container-delivery system, notification to parents and school staff will occur within two (2) business days following the application.
4. The administration will ensure that written notification is provided to all current pest control, construction and landscape contractors of the need to adhere to the IPM policy in any pest control, planning, new construction, repair or maintenance work done. Any pest control contractors hired will be required to inspect for conditions conducive to pest problems and develop appropriate prevention measures, not simply apply control materials. Pest control contractors will be expected to provide recommendations for structural improvements or repairs, and housekeeping and sanitation measures required to reduce or prevent recurrence of pest problems.
5. Signs will be posted on facility doors and near the site of planned applications at least three (3) business days in advance of pesticide use, and at the time of application. These signs will include the name of the pesticide used; date and time of application; warning or cautionary statements from product label (including restrictions on entering the treated areas or special cautions for certain individuals); information about availability of product labels, MSDS and inert ingredients lists at the facility office; and a contact phone number for those seeking additional information. Outdoor applications will be cordoned off and flagged. Signs shall remain in place for one week after pesticide application, or a longer period of time if specified by the pesticide label.

Pesticide Storage and Purchase

Pesticide purchases will be limited to the amount authorized for use during the year. Pesticides will be stored and disposed of in accordance with the EPA-registered label directions and state regulations. Pesticides must be stored in an appropriate, secure site not accessible to students or unauthorized personnel.

Pesticide Applicators

Pesticide applicators must be educated and trained in the principles and practices of IPM and the use of pesticides approved by this school. Applicators must follow regulations and label precautions. Applicators should be certified and comply with this IPM policy and any existing Pest Management Plan.